



ANTI-BRIBERY & CORRUPTION POLICY





Anti-Bribery and Corruption Policy

Company Name: Owen Lifting Services Ltd

1. Purpose

Owen Lifting Services Ltd is committed to conducting business with integrity, transparency, and in full compliance with all applicable anti-bribery and anti-corruption laws. This policy sets out the Company's zero-tolerance approach to bribery and corruption and provides guidance to employees and associated persons on how to recognize and prevent such conduct.

2. Scope

This policy applies to:

- All employees (permanent, temporary, and contract staff)
- Directors and officers
- Consultants, contractors, and suppliers
- Any third parties acting on behalf of the Company

3. Policy Statement

The Company strictly prohibits:

- Offering, giving, or receiving bribes
- Any form of corrupt payment, whether direct or indirect
- Facilitation payments (small payments made to expedite routine actions)

Bribery is defined as offering, promising, giving, accepting, or soliciting an advantage to influence a decision improperly.

4. Legal Compliance

The Company complies with all relevant legislation, including but not limited to:

- The UK Bribery Act 2010
- Any applicable international anti-corruption laws where the Company operates

Failure to comply may result in criminal penalties for both individuals and the Company.

5. Gifts and Hospitality

Reasonable and proportionate hospitality is permitted if it:

- Is not intended to influence business decisions
- Is appropriate, transparent, and properly recorded
- Complies with local laws and regulations

The following are prohibited:

- Cash or cash equivalents (e.g., vouchers)
- Excessive or lavish entertainment
- Gifts during tendering or contract negotiations

All gifts and hospitality above a nominal value must be declared and approved by management.

6. Facilitation Payments

Facilitation payments are strictly prohibited. Employees must refuse such payments and report any requests immediately.

7. Conflicts of Interest

Employees must avoid situations where personal interests conflict with Company interests. Any potential conflict must be disclosed to management promptly.

8. Third-Party Relationships

The Company conducts due diligence on third parties before engagement. Third parties must:

- Adhere to this policy
- Not engage in bribery on behalf of the Company
- Be monitored for compliance

9. Record Keeping

Accurate financial records must be maintained at all times.

- No off-the-books accounts are permitted
- All transactions must be documented transparently



10. Reporting Concerns

Employees are encouraged to report any suspected bribery or corruption. Reports can be made to:

- A line manager
- Senior management
- A designated compliance officer

All reports will be treated confidentially and without retaliation.

11. Training and Awareness

The Company will provide regular training to ensure employees understand:

- Their responsibilities under this policy
- How to identify and avoid bribery risks

12. Breach of Policy

Any breach of this policy may result in disciplinary action, including dismissal, and may lead to criminal prosecution.

13. Monitoring and Review

This policy will be reviewed regularly and updated as necessary to ensure effectiveness and compliance with legal requirements.

Approved by:

Management, Owen Lifting Services Ltd

Statement of Intent

Sign-Off

Director Name: Daniel Doherty

Signature:

Date: 07/01/2026